

**THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-------------------------------|---|--------------------------------------|
| In re: |) | Chapter 11 |
| |) | Case No. 20-07466 |
| WELL HEALED PET, INC., |) | Honorable A. Benjamin Goldgar |
| |) | Motion Date: March 30, 2020 |
| Debtor. |) | Motion Time: 9:30 a.m. |

NOTICE OF MOTION

TO: See Attached Service List

PLEASE TAKE NOTICE THAT on March 30, 2020, at the hour of 9:30 a.m., a **MOTION TO EMPLOY COUNSEL FOR DEBTOR** shall be heard by the Honorable A. Benjamin Goldgar of the United States Bankruptcy Court for the Northern District of Illinois, Eastern Division, in Room 642 at 219 South Dearborn, Chicago, Illinois. A copy of same is attached hereto and thereby served upon you. You may appear if you so see fit.

GOLAN CHRISTIE TAGLIA LLP

Affidavit of Service

I, Robert R. Benjamin, an attorney, certify that the above captioned Notice of Motion and Motion to Employ Counsel for Debtor were served upon the parties who receive notice via CM/ECF filing, electronic mail and those who receive notice via certified first class mail with postage prepaid from 70 W. Madison, Chicago, IL 60602 on March 16, 2020.

/s/Robert R. Benjamin
Robert R. Benjamin

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Mail Stop 5014CHI
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Chicago, Illinois 60604
Via Regular Mail

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Bankruptcy Section
PO Box 64338
Chicago, IL 60664
Via Regular Mail

Illinois Attorney General
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MOTION TO EMPLOY COUNSEL FOR THE DEBTOR

Debtor, WELL HEALED PET, INC. ("Debtor"), moves this Court for entry of an order approving the retention of Robert R. Benjamin, Beverly A. Berneman and Caren A. Lederer of GOLAN CHRISTIE TAGLIA LLP as counsel for the Debtor and respectfully represents to the Court as follows:

1. On March 16, 2020, Debtor filed a voluntary case under Chapter 11, Subchapter V of Title 11 of the United States Code ("Bankruptcy Code").
2. Debtor is in the business of veterinary medicine, pet store, and pharmacy.
3. The Debtor continues to operate its business and manage its property as debtor-in-possession pursuant to sections §§ 1107(a) and 1109 of the Bankruptcy Code.
4. No case trustee has been appointed to date.
5. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b).
6. Pursuant to Section 327(a) of the Bankruptcy Code, the Debtor, with Court approval, may employ attorneys, accountants, appraisers, auctioneers or other professional persons, all of whom must be disinterested.
7. The Debtor desires to retain the services of an attorney and request this Court to approve the retention of Robert R. Benjamin, Beverly A. Berneman and Caren A. Lederer of

Golan Christie Taglia LLP to act as counsel for the Debtor. Prior to the filing of the case, Debtor entered into a written agreement retaining the firm, a copy of which is attached hereto as **Exhibit 1**.

8. The aforementioned attorneys and the law firm of Golan Christie Taglia LLP are not owed any money by the estate nor does it have any interest adverse to the interests of this estate or any class of creditors or equity security holders and is considered a disinterested person under the Bankruptcy Code and accordingly qualified to serve as counsel pursuant to Section 327 of the Bankruptcy Code.

9. The professional services to be rendered by the above named law firm can generally be described as follows:

- (a) To render legal advice with respect to the powers and duties of the Debtor;
- (b) To prepare all necessary pleadings, orders and reports with respect to this proceeding and to render all other legal services as may be necessary proper therein; and
- (c) To do the necessary legal work regarding approval of the disclosure statement and plan.

10. Section 327(a) of the Bankruptcy Code provides that, subject to Court approval, the compensation of any professional person may be on any reasonable terms and conditions including on a retainer, hourly basis or contingent fee arrangement. The Debtor believes that the above described counsel should be paid their normal hourly rate.

11. The attorneys of the law firm of Golan Christie Taglia LLP are experienced bankruptcy counsel and through their retention the Debtor will be able to proceed expeditiously and effectively in this Court to the benefit of all parties in interest. Members of the firm of Golan Christie Taglia LLP have represented an average of six Chapter 11 debtors per year over the last forty (40) years. The firm's members have brought approximately 75% of those debtors to a

confirmed plan. In support of this motion, Debtor attaches hereto the affidavits of Robert R. Benjamin, Beverly A. Berneman and Caren A. Lederer.

WHEREFORE, Debtor, WELL HEALED PET, INC., prays this Honorable Court enter an order (i) authorizing as of March 16, 2020 to employ Robert R. Benjamin, Beverly A. Berneman and Caren A. Lederer of the law firm Golan Christie Taglia LLP for the Debtor in the instant proceedings; (ii) finding that the above-described counsel are qualified to serve as counsel for the Debtor-in-Possession pursuant to Section 327 of the Bankruptcy Code and that said counsel are disinterested within the definition of that term under Section 101(14) of said Bankruptcy Code; and (iii) for such other and further relief as this Court deems just and proper.

Dated: March 16, 2020

Respectfully submitted,

WELL HEALED PET, INC., Debtor,

/s/Robert R. Benjamin

One of its attorneys

Robert R. Benjamin (ARDC #0170429)
Beverly A. Berneman (ARDC #6189418)
Caren A. Lederer (ARDC #6244631)
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